

TITLE V APPLICATION REVIEW

PACIFIC GAS & ELECTRIC CO.(KETTLEMAN COMPRESSOR STATION)

Date of Application:	11/18/96	Engineers:	J. Lathrop S. Munir
Deemed Complete:	5/21/97	Facility #:	C-904
Date :	12/7/01	Project #:	960822
Facility Name:	Pacific Gas and Electric Company		
Mailing Address:	375 North Wiget Lane, Suite 130 Walnut Creek, CA 94598		
Contact Person:	Linda Gonsalves		
Phone:	(510) 974-4081		
Responsible Official:	William R. Mazotti		
Title:	Vice President, Gas Services & Operations		

I. PROPOSAL

Pacific Gas and Electric Company is proposing that an initial Operating Permit be issued for its natural gas compression station located in Avenal, CA. The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with those applicable requirements, and to provide the legal and factual basis for proposed permit conditions.

II. FACILITY LOCATION

The Kettleman Compressor Station is located at 34453 Plymouth Avenue in Avenal, California.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at this facility is in Appendix A.

A summary of exempt equipment categories which describes the insignificant activities or equipment at the facility not requiring a permit is shown in Attachment B. This equipment is not exempt from facility-wide requirements.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant has requested to utilize template No. SJV-IC-1-0, Series 1 Internal Combustion Engines, for the 55 BHP and 76 BHP Diesel engines C-904-25-0 and C-904-26-0. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

V. SCOPE OF EPA AND PUBLIC REVIEW

Certain segments of the proposed Operating Permit are based on a model general permit template that has been previously subject to EPA and public review. The terms and conditions from the model general permit template are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing a model general permit template, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for that model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

The following permit conditions, including their underlying applicable requirements, originate from the model general permit template and are not subject to further EPA and public review:

Conditions 1 through 11 of the requirements of permit units C-904-25-1 and C-904-26-1

VI. APPLICABLE REQUIREMENTS ADDRESSED BY THE GENERAL PERMIT TEMPLATE

District Rule 4201 Particulate Matter Concentration (Amended December 17, 1992)¹

Kings County Rule 407 Sulfur Compounds¹

District Rule 2520 Federally Mandated Operating Permits (Adopted June 15, 1995)

¹

¹ Template SJV-IC-1-0 addresses these requirements for permit units C-904-25-0 and C-904-26-0

VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY THE GENERAL PERMIT TEMPLATE

District New and Modified Stationary Source Review Rule (NSR)

District Rule 1100 Equipment Breakdown (Amended December 17, 1992)

District Rule 1160 Emission Statements (Adopted November 18, 1992)

District Rule 2010 Permits Required (Amended December 17, 1992)

District Rule 2020 Exemptions (Amended July 21, 1994)

District Rule 2031 Transfer of Permits (Amended December 17, 1992)

District Rule 2040 Applications (Amended December 17, 1992)

District Rule 2070 Standards for Granting Applications (Amended December 17, 1992)

District Rule 2080 Conditional Approval (Amended December 17, 1992)

District Rule 2520 Federally Mandated Operating Permits (Adopted June 15, 1995)²

District Rule 1081 Source Sampling (Amended December 16, 1993)

District Rule 4101 Visible Emissions (Amended December 17, 1992)

District Rule 4201 Particulate Matter Concentration (Amended December 17, 1992)²

District Rule 4601 Architectural Coatings (Amended December 17, 1992)

District Rule 4621 Gasoline Transfer Into Stationary Storage Containers, Delivery Vessels and Bulk Plants (Amended May 20, 1993)

District Rule 4622 Transfer of Gasoline Into Vehicle Fuel Tanks (Amended February 17, 1994)

District Rule 4623 Storage of Organic Liquids (Amended December 17, 1992)

District Rule 4625 Wastewater Separators (Amended December 17, 1992)

District Rule 4801 Sulfur Compounds (Amended December 17, 1992)²

District Rule 8020 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM-10) from Construction, Demolition, Excavation, and Extraction Activities (Amended April 25, 1996)

District Rule 8030 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM-10) from Handling and Storage of Bulk Materials (Amended April 25, 1996)

District Rule 8060 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM-10) from Paved and Unpaved Roads (Amended April 25, 1996)

40 CFR Part 61 Subpart M National Emission Standard for Asbestos

40 CFR Part 82 Subpart F Stratospheric Ozone

² Template SJV-IC-1-0 addresses these requirements for permit units C-904-25-0 and C-904-26-0. These requirements are addressed outside the template in this evaluation for all other permit units.

VIII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as Federally Enforceable Through Title V Permit.

For this facility, the following conditions of the Operating Permit are not Federally Enforceable through Title V:

Conditions 2, 3, 6, 7 and 9-13 of the requirements for permit units C-904-6-2 through C-904-9-2

Conditions 1, 2, 3, 4, 5, 6, 7 and 8 of the requirements for permit unit C-904-24-1

Conditions 12, 13, 14, 15 and 16 of the requirements for permit unit C-904-25-1 and C-904-26-1

Condition 2 of the requirements for permit units C-904-2-1, C-904-3-1, C-904-4-1, C-904-5-1, C-904-10-1, C-904-11-1, C-904-12-1, C-904-13-1, C-904-14-1, C-904-15-1, C-904-16-1, C-904-17-1 and C-904-18-1

IX. COMPLIANCE

A. Requirements Addressed by Model General Permit Template

1. 55 BHP and 76 BHP Diesel IC Engines

The applicant is proposing to use a general permit template to address federally applicable requirements for the 55 BHP and 76 BHP IC engines. Section IV of template SJV-IC-1-0 includes a demonstration of compliance for all applicable requirements. Template conditions have been added to the requirements for permit units C-904-25-1 and C-904-26-1 as condition numbers 1 through 11 to assure compliance with these requirements.

B. Requirements Not Addressed by Model General Permit Template

1. New and Modified Stationary Source Review Rule (NSR)

a. 580 HP, 2050 HP and 7250 HP IC Engines

These units were in operation prior to the adoption of the first Kings County NSR Rule. The permit units C-904-2-0 through C-904-5-0 and C-904-10-0 through C-904-18-0 are considered previously existing equipment and the District NSR Rule does not apply.

b. 1320-HP IC Engines

Permit units C-904-6-1 through C-904-9-1 were subject to the NSR Rule at the time the applicant applied for Authority to Construct (ATC) these units. ATCs C-904-6-1 through C-904-9-1 were issued by SJVUAPCD on May 25, 1995.

- The requirements of condition 1 of each ATC are redundant to condition 22 of the facility wide requirements (C-9040-0). Both require that no air contaminant be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or 20% opacity. Therefore, it is not necessary to add this condition to the requirements for this permit unit.
- Condition 2 of each ATC has been included as condition 1 of the requirements for permit units C-904-6-2 through C-904-9-2.

- Condition 3 of each ATC has been included as condition 2 of the requirements for permit units C-904-6-2 through C-904-9-2. This condition is not federally enforceable since the emission concentration limit was based on District Rule 4701 which is not in the SIP.
- Condition 4 of each ATC has been included as condition 3 of the requirements for permit units C-904-6-2 through C-904-9-2. This condition is not federally enforceable since the emission concentration limit was based on District Rule 4701 which is not in the SIP.
- Condition 5 of each ATC has not been included as a requirement for permit units C-904-6-2 through C-904-9-2 since it is a one time source test requirement intended to verify compliance with the emission limits after the installation of new carburetors.
- Condition 6 of each ATC has been included as condition 4 of the requirements for permit units C-904-6-2 through C-904-9-2.
- Condition 7 of each ATC has been included as condition 5 of the requirements for permit units C-904-6-2 through C-904-9-2.
- Condition 8 of each ATC has been included as condition 6 of the requirements for permit units C-904-6-2 through C-904-9-2. This condition is not federally enforceable since the testing requirement was intended to verify compliance with District Rule 4701 which is not in the SIP.
- Condition 9 of each ATC requires 1) a record of monthly fuel consumption and hours of operation, and 2) retention of records for at least two years. This condition was re-worded per the applicant's request to coincide more closely with actual data collected at the facility. The monthly record requirement was included as condition 7 of the requirements for permit units C-904-6-2 through C-904-9-2. The two year record retention requirement was not included in the requirements for these permit units, as this part of the ATC requirement is redundant to condition 9 of the facility wide requirements (N-904-0-0). Condition 9 of the facility wide requirements (N-904-0-0) also specifies record retention requirements, but the retention time is five years to comply with District Rule 2520.
- Condition 10 of each ATC has not been incorporated into the requirements for these permit units since it is a pre-startup requirement. This condition requires the applicant to submit an emission control plan in compliance with District Rule 4701, Section 5.4.2 prior to the start-up of the engines.
- Condition 11 of each ATC has been included as condition 8 of the requirements for permit unit C-904-6-2 through C-904-9-2.

c. Oil Water Separator

The permit unit C-904-19-0 was installed in 1987 and an in-house Permit to Operate was issued in April 25, 1994. At the time of installation, this unit was exempt from Kings Co. permit requirements. Therefore, this unit is not considered to be new or modified for the purposes of NSR requirements. Hence, this permitted unit is not subject to any District NSR requirements.

d. 95-HP Standby IC Engine

Between 3/11/86 and 8/22/89, IC engines rated ≤ 250 hp were exempt from permit requirements in Kings County. Because this engine, permit unit C-904-20-0, was installed in 1988, it is considered previously existing equipment and the District NSR Rule requirements do not apply.

e. One 2,000 gallon Aboveground Storage Tank

Permit unit C-904-22-0 was subject to the NSR Rule at the time the applicant applied for Authority to Construct (ATC) this unit. ATC #9201 was issued by the Kings Zone of the SJVUAPCD on February 7, 1992.

- Condition 1 of the ATC has not been incorporated into the requirements for this permit unit because it is considered extraneous. The condition states that all proposals submitted by the applicant will be incorporated as permit conditions, but the application for Authority to Construct reveals no information which may be used as conditions to a Permit.
- Condition 2 of the ATC has not been incorporated into the requirements for this permit unit because it is a pre-startup requirement. It requires that a notification be submitted to the District prior to the startup of the equipment.
- Condition 3 of the ATC has been reworded. The reference to the State's Executive Order G-70-129 has been eliminated; the permit now assures compliance with the underlying requirement by referring to certified Phase I and Phase II vapor recovery systems. The reworded condition has been incorporated into the requirements for permit unit C-904-22-1 as condition 4 and 6.
- Condition 4 of the ATC has not been incorporated into the requirements for the permit unit as it has been excluded from the

Permit to Operate conditions. The public nuisance requirement of this condition is not appropriately applicable to this unit.

- Condition 5 of the ATC has been reworded to reflect the Rule 2520 requirement for five year record retention and included in the requirements for permit unit C-904-22-1 as condition 16.

f. Unconfined Abrasive Blasting

Title 17 of the California Administrative code dictates that the Air Districts are not allowed to impose any requirement that is stricter or less strict than Title 17. The District Permit does not contain any NSR limits that apply to the abrasive blasting operation permit unit (C-904-24-0).

g. 55 BHP and 76 BHP Diesel IC Engines

Prior to 8/22/89, Kings County exempted engines rated <250 hp from permit requirements. Because the engines, permit units C-904-25-0 and C-904-26-0, were installed in 1984 and 1986, they are considered previously existing equipment and District NSR Rule requirements do not apply.

2. District Rule 1100

a. Entire Facility

Sections 6.0 and 7.0 set forth breakdown procedures and reporting requirements. These requirements are addressed by conditions 1, 2 and 11 of the facility wide requirements (C-904-0-0). District Rule 1100 has been submitted to the EPA to replace the Kings County Rule 111 in the SIP. District Rule 1100 is at least as stringent as the county SIP rule addressing breakdowns as provided in Table 1, Comparison of District Rule 1100 to Kings County APCD Rule 111.

Table 1 - Comparison of District Rule 1100 to Kings County APCD Rule 111

REQUIREMENTS	District Rule	Kings Co APCD
A breakdown occurrence must be reported as soon as reasonably possible but no later than 1 hour after detection.	✓	✓
A variance must be obtained if the occurrence will last longer than a production run or 24 hours, whichever is shorter (96 hours for CEM systems).	✓	
A report must be submitted to the APCO within 10 days of the correction of the breakdown occurrence which includes the following:	✓	✓
1) A statement that the breakdown condition has been corrected, together with the date of correction and proof of compliance.	✓	✓
2) A specific statement of the reason(s) or cause(s) for the occurrence sufficient to enable the APCO to determine whether the occurrence was a breakdown condition.	✓	✓
3) A description of the corrective measures undertaken and/or to be undertaken to avoid such an occurrence in the future.	✓	✓
4) An estimate of the emissions caused by the occurrence.	✓	✓
5) Pictures of the equipment or controls which failed if available.	✓	✓

3. District Rule 1160

a. Entire Facility

Section 5.0 requires the owner or operator of any stationary source to provide the District with a written emission statement showing actual emissions of reactive organic gases (ROGs) and nitrogen oxides (NOx) from that source. The District waives this requirement for sources emitting less than 25 tons per year of these pollutants if the District provides the Air Resources Board (ARB) with an emission inventory of sources emitting greater than 10 tons per year of NOx or ROGs based on the use of emission factors acceptable to the ARB. See condition 3 of the facility wide requirements (C-904-0-0).

4. District Rule 2010 and 2020

a. Entire Facility

District Rule 2010 sections 3.0 and 4.0 require any person building, modifying or replacing any operation that may cause the issuance of air contaminants to apply for an Authority to Construct (ATC) with the District in advance. The ATC will remain in effect until the Permit to Operate (PTO) is granted. District Rule 2020 lists equipment which are specifically exempt from obtaining permits and specifies record keeping requirements to verify such exemptions. These requirements are stated in condition 4 of the facility wide requirements (C-904-0-0). District Rule 2010 and 2020 have been submitted to the EPA to replace Kings County APCD Rules 201 and 202, respectively. The comparison of District and County rules are presented in Table 3, Comparison of District Rule 2010 to Kings County APCD Rule 201 and Table 2, Comparison of District Rule 2020 to Kings County APCD Rule 202.

Table 2 - Comparison of District Rule 2010 to Kings County APCD Rule 201

REQUIREMENTS	District Rule 2010	Kings County APCD Rule 201
An ATC is required for the building, alteration, or replacement of a source of air contaminants.	✓	✓
A PTO is required before a new or modified source or an existing source is operated.	✓	✓
Before operating new equipment, notification must be given to the District. The ATC will serve as a temporary PTO until the PTO is granted/denied.	✓	
The ATC granted to modify a source will serve as a temporary PTO until the PTO is granted/denied.	✓	
An application for a PTO for existing equipment will serve as a temporary PTO. If the source had a previous PTO, it must not be operated under the temporary PTO contrary to the conditions of the previous PTO.	✓	
The PTO must be affixed on the source operation or must be maintained available at all times on the operating premises.	✓	✓
A PTO must not be defaced, altered, forged, counterfeited or falsified.	✓	✓

Table 3 - Comparison of District Rule 2020 to Kings County APCD Rule 202

REQUIREMENTS	District	Kings
--------------	----------	-------

	Rule 2020	County APCD Rule 202
An ATC or PTO is not required for listed exempt equipment.	✓	✓
Conditions are stated under which listed exempt equipment will require an ATC or PTO.	✓	
Record keeping is required to verify and maintain exemption, when the exemption is based on a maximum daily limitation.	✓	
A compliance schedule is stated for equipment which loses exemption from permitting, necessitating submission of a PTO application.	✓	

5. District Rule 2031, 2070 and 2080

a. Entire Facility

These rules set forth requirements to comply with all conditions of the Permit to Operate. Permits to Operate or Authorities to Construct are not transferable unless a new application is filed with and approved by the District. All source operations must be constructed and operated as specified in the Authority to Construct.

See conditions 5 and 6 of the facility wide requirements (C-904-0-0). District Rule 2031 has been submitted to the EPA to replace Kings County APCD Rule 203. District Rules 2070 and 2080 have been submitted to replace Kings County APCD Rules 208 and 209, respectively. A comparison of the District and County rules are presented in Table 4, Comparison of District Rule 2031 to Kings County APCD Rule 203, Table 5, Comparison of District Rule 2070 to Kings County APCD Rule 208 and Table 6, Comparison of District Rule 2080 to Kings County APCD Rule 209.

Table 4 - Comparison of District Rule 2031 to Kings County APCD Rule 203

Requirements	District	Kings Co
---------------------	-----------------	-----------------

	Rule	APCD
A permit will not be transferable from one location to another.	✓	✓
A permit will not be transferable from one piece of equipment to another.	✓	✓
A permit will not be transferable from one person to another.	✓	✓

Table 5 - Comparison of District Rule 2070 to Kings County APCD Rule 208

Requirements	District Rule	Kings Co APCD
An ATC or PTO will be denied if the source emits air contaminants in violation of applicable sections of the Health and Safety Code or District Rules and Regulations.	✓	✓
An ATC or PTO will be denied if the source does not comply with requirements of the <u>New and Modified Source Review Rule</u> .	✓	
An ATC or PTO will be denied if the source does not comply with provisions of rules stating <u>New Source Performance Standards</u> or <u>National Emissions Standards for Hazardous Air Pollutants</u> .	✓	
A PTO will be denied if the source has not been constructed in accordance with the ATC.	✓	✓
A source may not be operated contrary to the conditions of the PTO.	✓	
Before a permit is granted, the applicant may be required to provide and maintain facilities for sampling and testing of air contaminants discharged.		✓

Table 6 - Comparison of District Rule 2080 to Kings County APCD Rule 209

Requirements	District Rule	Kings Co APCD
An ATC or PTO may be issued subject to conditions specified in writing to insure compliance with standards of the rule <u>Standards for Granting Applications</u> .	✓	✓
An ATC or PTO with revised conditions will be issued upon receipt of a new application, if it is demonstrated that the source will operate within the standards of the rule <u>Standards for Granting Applications</u> , under the revised conditions.	✓	✓

6. District Rule 2040

a. Entire Facility

Section 3.0 requires that every application for a permit shall be filed in a manner and form prescribed by the District. See condition 7 of the facility wide requirements (N-2274-0-0). District Rule 2040 has been submitted to the EPA to replace Kings County APCD Rule 204. The District rule is at least as stringent as the County rule, as shown in the Table 7, Comparison of District Rule 2040 to Kings County APCD Rule 204.

Table 7 - Comparison of District Rule 2040 to Kings County APCD Rule 204

Requirements	District Rule	Kings Co APCD
Every application must be filed in a manner and form prescribed and must give all information necessary to enable a determination to be made as required by the rule <u>Standards for Granting Applications</u> .	✓	✓
Further information or plans or specifications may be required before an application for a permit is acted upon.	✓	
Written notification of the reason(s) will be given in the event an application is denied. No further application will be accepted until the applicant has complied with the reasons specified for application denial.	✓	
An application may be deemed denied if not acted upon within 60 days after filing.	✓	
Within 10 days of receipt of notification of application denial, an applicant may petition the Hearing Board for a public hearing. A public notice will be given 10 days before a public hearing and the public hearing will be held 30 days after the petition is filed.	✓	

7. District Rule 2520

a. Entire Facility

Section 5.2 requires that permittees submit applications for Title V permit renewal at least six months prior to permit expiration. Condition 36 of the facility wide requirements (C-904-0-0) assures compliance with this requirement.

Section 9.0 of District Rule 2520 requires certain elements to be contained in each Title V permit:

Sections 9.5.1 and 9.5.2 contain requirements to incorporate all applicable record keeping requirements into the Title V permit, specific records of any required monitoring, and the retention of all

required monitoring data and support information for five years. The requirements to keep specific monitoring records and retain records for five years are stated in conditions 8 and 9 of the facility wide requirements (C-904-0-0), respectively.

Section 9.6 contains requirements for the submittal of reports of monitoring at least every six months and prompt reporting of deviations from permitting requirements, including those attributable to upset conditions. All required reports must be certified by the responsible official. These requirements are stated in conditions 10 and 11 of the facility wide requirements (C-904-0-0).

Section 9.8 states that the Title V permit must also contain a severability clause in case of a court challenge; the severability clause is stated in condition 12 of facility wide requirements (C-904-0-0).

Section 9.9 contains requirements for provisions in the Title V permit stating that 1) the permittee must comply with all permit conditions; 2) that the permitted activity would have to be reduced to comply with the permit conditions should not be a defense in an enforcement action, 3) that the permit may be revoked, modified, reissued, or reopened for cause, 4) that the Title V permit does not reflect any property rights, and 5) that the permittee will furnish the District with any requested information to determine compliance with the conditions of the Title V permit. Compliance with these sections of Rule 2520 will be assured by conditions 5 and 13 through 16 of the facility wide requirements (C-904-0-0).

Section 9.10 contains the requirement to provide in the permit that the permittee pay annual permit fees and applicable fees from District Rules 3010, 3030, 3050, 3080, 3090, 3110, and 3120. This requirement is stated in condition 17 of the facility wide requirements (C-904-0-0).

Section 9.14.1 requires any report or document submitted under a permit requirement or a request for information by the District or EPA shall contain a certification by a responsible official to truth, accuracy, and completeness. Compliance with this section will be assured by condition 28 of facility wide requirements (C-904-0-0).

Section 9.14.2 contains inspection and entry requirements that allow an authorized representative of the District to enter a permittee's premises to inspect equipment, operations, work practices, permits on file, and to sample substances or monitor parameters for the purpose of assuring compliance with the permit requirements.

Compliance with this section will be assured by conditions 18, 19, 20 and 21 of the facility wide requirements (C-904-0-0).

Section 9.17 requires that the permittee submit certification of compliance with the terms and standards of Title V permits to the EPA and the District annually (or more frequently as required by the applicable requirement or the District). Condition 35 of the facility wide requirements (C-904-0-0) assures compliance with this requirement.

Section 10.0 Requires any application form, report or compliance certification submitted pursuant to these regulations shall contain certification of truth accuracy, and completeness by a responsible official. Compliance with this section will be assured by condition 28 of the facility wide requirements (C-904-0-0.)

8. District Rule 4101 and Kings County Rule 401

a. Entire Facility

District Rule 4101 has been submitted to the EPA to replace Kings County Rule 401. EPA made a preliminary determination that District Rule 4101 is "more stringent" than the county versions previously referenced, per correspondence dated August 20, 1996.

Section 5.0 prohibits the discharge of any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart; or is of such opacity as to obscure an observer's view to a degree equal to or greater than 20% opacity. This requirement is stated in condition 22 of the facility wide requirements (C-904-0-0).

9. District Rule 4601

a. Entire Facility

This SIP approved rule limits the emissions of VOCs from architectural coatings. It requires limiting the application of coating to no more than 250 grams of VOC/liter of coating (less water and

exempt compounds). It also limits the use of Specialty Coatings to a VOC content not to exceed the specified limits in Table 1 of Rule 4601. This rule further specifies labeling requirements, coatings thinning recommendations, storage requirements and cleanup requirements. See conditions 23, 24, 25, 26 and 27 of the facility wide requirements (C-904-0-0).

10. District Rule 4002 - National Emissions Standard for Asbestos - 40 CFR Part 61.145, 61.150

a. Entire Facility

There are applicable requirements from the National Emissions Standards for Hazardous Air Pollutants that apply to all sources in general. These requirements pertain to asbestos removal and disposal from renovated or demolished structures. Compliance is assured for these requirements by condition 34 of the facility wide requirements (C-904-0-0).

11. Title VI of the CAA - Stratospheric Ozone

a. Entire Facility

There are applicable requirements from Title VI of the CAA (Stratospheric Ozone) that apply to all sources in general. These requirements pertain to air conditioners, chillers and refrigerators located at a Title V source and to disposal of air conditioners or maintenance/recharging/disposal of motor vehicle air conditioners (MVAC). These requirements are addressed in conditions 29 and 30 of the facility wide requirements (C-904-0-0).

12. SJVUAPCD Regulation VIII - Fugitive Dust (PM10)

a. Entire Facility

These regulations contain requirements for the control of fugitive dust. These requirements apply to various sources: construction, demolition, excavation, extraction, and water mining activities; outdoor storage piles; paved and unpaved roads. Compliance with these regulations will be required by conditions 31, 32, and 33 of the facility wide requirements (C-904-0-0).

13. District Rule 1081

a. 1,320 HP IC Engines (C-904-6-2 through C-904-9-2)

Sections 7.0 sets forth administrative requirements. These requirements are addressed by conditions 4 and 5 of the requirements for permit units C-904-6-2 through C-904-9-2.

District Rule 1081 has been submitted to the EPA to replace Kings County APCD Rule 108.1 which is in the SIP. Table 8 is a comparison of the applicable requirements of District Rule 1081 and Kings County APCD Rule 108.1 and demonstrates that District Rule 1081 is more stringent than Kings County APCD Rule 108.1. Compliance with District Rule 1081 will insure compliance with Kings County APCD Rule 108.1.

Table 8 - Comparison of District Rule 1081 and Kings County APCD Rule 108.1

Requirements	District Rule	Kings CAPCD
Upon request of the APCO, the source shall provide information. and records to enable the APCO to determine when a representative sample can be taken.	✓	✓
The facility shall collect, have collected or allow the APCO to collect, a source sample.	✓	✓
The source shall have District personnel present at a source test.	✓	
The applicable test method, if not specified in the rule, shall be conducted in accordance with sections of 40 CFR § 60.	✓	✓
Test procedures: 1) arithmetic mean of three runs, 2) a scheduled source test may not be discontinued solely due to the failure to meet the applicable standard(s), and 3) arithmetic mean of two runs is acceptable if circumstances beyond owner or operator control occurs.	✓	
Quarterly reporting requirements:		✓

14. District Rule 4201

a. 95-HP, 580-HP, 1320-HP, 2050-HP, and 7250-HP IC Engines

District Rule 4201 limits the concentration of total suspended particulate matter emission to not exceed 0.1 grain per cubic foot of gas at dry standard conditions. The following analysis demonstrates that compliance is expected.

Equation 1 (PM Concentration)

$$\left(\frac{0.0007 \text{ lb PM}}{\text{MMBtu}} \right) \left(\frac{7000 \text{ grains}}{\text{lb}} \right) \left(\frac{\text{MMBtu}}{8710 \text{ dscf}} \right) = 0.00056 \frac{\text{grain}}{\text{dscf}} < \left(\frac{0.1 \text{ grain}}{\text{dscf}} \right)$$

where:

$$\frac{0.0007 \text{ lb PM}}{\text{MMBtu}} = \text{Emission Factor (AP-42 Table 3.2-5)}$$

$$\frac{7000 \text{ grain}}{1 \text{ lb}} = \text{conversion factor (AP42, Appendix A)}$$

$$\frac{\text{MMBtu}}{8710 \text{ dscf}} = \text{F Factor, } F_d, \text{ for natural gas (40 CFR 60, App. A, Table 19-1)}$$

Equation 1 demonstrates that emission of PM are expected to not exceed the applicable limits for these natural gas fired IC engines.

Conditions 3 and 5 of the requirements for permit units C-904-2-1 through C-904-5-1 and C-904-10-1 through C904-18-0 assure compliance with this requirement. Conditions 14 and 16 of the requirements for permit units C-903-6-2 through C-904-9-2 and conditions 2 and 4 of the requirements for permit unit C-904-20-1 also assure compliance with District Rule 4201, Section 3.1.

15. District Rule 4801

a. 95-HP, 580-HP, 1320-HP, 2050-HP and 7250-HP IC Engines

Table 9 lists all the applicable requirements of District Rule 4801 and shows which are included in the SIP approved old county rule. This table demonstrates that District Rule 4801 is as stringent as the Kings County Air Pollution Control District Rule 407, thus Rule 407 will be subsumed by Rule 4801 for the purposes of the operating permit.

Table 9 - Comparison of District Rule 4801 and Kings County APCD Rule 407

Requirements	SJVUAPC D 4801	Kings Co. APCD 407
A person shall not discharge into the atmosphere sulfur	✓	✓

compounds exceeding in concentration at the point of discharge 0.2 percent by volume calculated as sulfur dioxide on a dry basis averaged over 15 consecutive minutes.		
EPA Method 8 or ARB Method 1-100 shall be used to determine such emissions.	✓	

Section 3.1 requires the emission concentration of sulfur compounds to not exceed two-tenths (0.2) percent by volume calculated as sulfur dioxide (SO₂), on a dry basis averaged over 15 consecutive minutes. The following analysis demonstrates that compliance is expected.

The combustion equation for natural gas is (neglecting NO_x and SO_x relative to O₂ in the exhaust):



where, Y = moles of sulfur in the fuel
 X = moles of excess air

solving an expression for the fraction of O₂ in the exhaust by volume gives:

$$\frac{X}{3 + X + (2 + X)3.78} = 0.04 \Rightarrow X = 0.523$$

where, 3 = combined total moles of CO₂ and H₂O in the exhaust
 0.04 = fraction of O₂ in the exhaust by volume

solving for Y in an expression for the fraction of SO₂ in the dry exhaust by volume gives:

$$\frac{Y}{1 + 0.523 + 9.54} = 0.002 \Rightarrow Y = 0.022$$

where, Y = mole fraction of S per mole of CH₄ combusted
 1 = moles of CO₂ in the exhaust
 9.54 = moles of N₂ in the exhaust
 0.002 = 2000 ppmv SO_x emission limit

Use Y to calculate the weight fraction of S in 1 mole of CH₄:

$$\frac{(0.022)(32.06)}{16.04 + (0.022)(32.06)} = 0.042 = 4.2\% \text{ S by weight in the fuel}$$

where, 32.06 = molecular weight of sulfur (S)

16.04 = molecular weight of CH₄

0.042 = fraction of S by weight in the fuel

This analysis shows that natural gas with a sulfur content of less than 4.2% by weight will satisfy the District's sulfur compounds rule.

IC engines listed solely use PUC regulated natural gas. Therefore, only record keeping will be required. General Order 58-A of the PUC (see Appendix C) requires all natural gas that enters the PUC pipeline for distribution to consumers to contain less than or equal to 5 grains of total sulfur per 100 standard cubic feet. All natural gas that enters the PUC pipeline for distribution to consumers is tested regularly to assure that its composition conforms to this standard. This standard can be converted to an expression of weight percent of sulfur in the natural gas (ng):

$$\% S \left(\frac{lbS}{lbNG} \right) = 100 \times \left(\frac{5gr}{100ft^3} \right) \left(\frac{1lb}{7000gr} \right) \left(\frac{24.45L}{mol NG} \right) \left(\frac{1mol NG}{16.04g} \right) \left(\frac{453.59g}{1lb} \right) \left(\frac{0.035ft^3}{1L} \right)$$

$$= 0.017\% \text{ sulfur}$$

The above analysis demonstrates that emission of SO₂ are expected to be below the applicable limits. If the natural gas fired by this IC engine is not PUC regulated, testing and recordkeeping is required. Conditions 6 and 7 of the requirements for permit units C-904-2-1 through C-904-5-1 and C-904-10-1 through C-904-18-1; conditions 17 and 18 of the requirements for permit units C-904-6-2 through C-904-9-2; and condition 5 and 6 of the requirements for permit unit C-904-20-1 assure compliance with testing and record keeping requirements.

16. District Rule 4625

a. Oil/Water Separator

Section 5.1 requires that all openings of an oil/water separator be covered with a solid cover. Condition 3 and 4 of the requirements for permit unit C-904-19-1 assures compliance with this requirement.

Section 5.3 requires that all oil/water separator forbays be covered. Condition 5 of the requirements for permit unit C-904-19-1 assures compliance with this requirement.

Section 5.4 sets requirements for the processing of skimmed oil from the oil/water separator. Condition 6 of C-904-19-1 assures compliance with this requirement.

17. District Rule 4621

a. 2,000 Gallon Aboveground Storage Tank

This rule requires that gasoline storage tanks be equipped with an ARB-certified Phase I vapor recovery system and that the vapor recovery system be maintained and operated according to manufacturer's specifications. The rule further requires that no delivery vessel be allowed to operate unless valid state decals are displayed. Aboveground storage tanks must be equipped with a pressure-vacuum valve set to within 10% of the maximum allowable working pressure of the tank.

Compliance with this rule is assured by permit conditions #2–5 of the requirements for permit unit C-904-22-1.

18. District Rule 4622

a. 2,000 Gallon Aboveground Storage Tank

This rule requires that gasoline storage and dispensing facilities be equipped with an ARB-certified Phase II vapor recovery system and that the vapor recovery system be source tested and maintained in good working order. In the event that specific system defects are found, the rule requires that the defective component be tagged "Out of Order" and shut down until the defect has been repaired. The system cannot be tampered with in any way that affects effectiveness or operation nor can an ARB certified system be removed once installed. Topping off a motor vehicle fuel tank is prohibited. The rule also contains requirements applicable to retail service stations only which require a prominent display of operating instructions along with the posting of a toll-free telephone number to report complaints and hold-open latches on dispensing nozzles.

Compliance with this rule is assured by permit conditions 6, 8 to 12, 14, and 15 of the requirements for permit unit C-904-22-1.

19. District Rule 4623, section 5.4

a. 2,000 Gallon Aboveground Storage Tank

Section 5.4 is the only provision in Rule 4623 which applies to this permit unit. Other sections of this rule apply to internal or external floating roof tanks with capacity of 19,800 gallons or more.

Section 5.4 of Rule 4623 reiterates the requirement of District Rule 4621 wherein above-ground gasoline storage tanks with capacity of 19,800 gallons or more must be equipped with a pressure-vacuum valve set to within 10% of the maximum allowable working pressure of the tank.

Compliance with this rule is assured by permit condition #3 of the requirements for permit unit C-904-22-1.

X. PERMIT SHIELD

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Title V permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

A. Requirements addressed by Model General Permit Templates

By submitting model general permit template SJV-IC-1-0, the applicant has requested that a permit shield be granted for all the applicable requirements identified by the template. Therefore, the permit shield as granted in the model general permit template is included as conditions 10 and 11 of the requirements for permit units C-904-25-1 and C-904-26-1.

B. Requirements not Addressed by Model General Permit Templates

1. District Rule 1100

Compliance with this requirement was addressed in Section IX of this document and is assured by the facility wide requirements (C-904-0-0), conditions 1, 2, and 11. Therefore, a permit shield is being granted for this requirement in the facility wide requirements (C-904-0-0), condition 39.

2. District Rule 2010 and 2020

Compliance with these requirements was addressed in Section IX of this document and is assured by the facility wide requirements (C-904-0-0), condition 4. Therefore, a permit shield is being granted for these requirements in the facility wide requirements (C-904-0-0), condition 39.

3. District Rule 2031, 2070, and 2080

Compliance with these requirements was addressed in Section IX of this document and is assured by the facility wide requirements (C-904-0-0), conditions 5 and 6. Therefore, a permit shield is being granted for these requirements in the facility wide requirements (C-904-0-0), condition 39.

4. District Rule 2040

Compliance with this requirement was addressed in Section IX of this document and is assured by the facility wide requirements (C-904-0-0), condition 7. Therefore, a permit shield is being granted for this requirement in the facility wide requirements (C-904-0-0), condition 39.

5. District Rule 4101

Compliance with this requirement was addressed in Section IX of this document and is assured by the facility wide requirements (C-904-0-0), condition 22. Therefore, a permit shield is being granted for this requirement in the facility wide requirements (C-904-0-0), condition 39.

6. District Rule 4601

Compliance with this requirement was addressed in Section IX of this document and is assured by the facility wide requirements (C-904-0-0), conditions 23, 24, 25, and 26. Therefore, a permit shield is being granted for this requirement in the facility wide requirements (C-904-0-0), condition 39.

7. District Rule 4102

Compliance with this requirement was addressed in Section IX of this document and is assured by the requirements for permit units C-904-25-1 and C-904-26-1, condition 12. Therefore, a permit shield is being granted for this requirement in the requirements for permit unit C-904-0-0, condition 39.

8. District Rules 4201 and 4801 and Kings County Rules 404 and 407

Compliance with this requirement was addressed in Section IX of this document and is assured by conditions 3, 5, 6 and 7 of the requirements for permit units C-904-2-1 through C-904-5-1 and C-904-10-1 through C-904-18-1; conditions 14, 16, 17 and 18 of the requirements for permit units C-904-6-2 through C-904-9-2; conditions 2 4, 5 and 6 of the requirements for permit unit C-904-20-1. Therefore, a permit shield is being granted for this requirement in condition 8 of the requirements for permit units C-904-2-1 through C-904-5-1 and C-904-10-1 through C-904-18-1; condition 20 of the requirements for permit units C-904-6-2 through C-904-9-2; and condition 7 of the requirements for permit unit C-904-20-1.

9. District Rule 4625

Compliance with this requirement was addressed in Section IX of this document and is assured by conditions 3, 4 and 5 of the requirements for permit unit C-904-19-1. Therefore, a permit shield is being granted for this requirement in condition 7 of the requirements for permit unit C-904-19-1.

10. District Rules 4621, 4622 and 4623

Compliance with this requirement was addressed in Section IX of this document and is assured by conditions 2 through 12, 14 and 15 of the requirements for permit unit C-904-22-1. Therefore, a permit shield is being granted for this requirement in condition 17 of the requirements for permit unit C-904-22-1.

XI. PERMIT CONDITIONS

See attached Draft Operating Permits.

Appendix A

Equipment listing

Appendix B

Listing of Exempt Equipment

The following exempt equipment was identified by the applicant on TVFORM-003,
Insignificant Activities

Exemption Category	Rule 2020 Citation
Natural gas or LPG-fired boilers or other indirect heat transfer units of 5 MMBtu/hr or less.	5.1.1
Piston-type internal combustion engine with maximum continuous rating of 50 braking horsepower (bhp) or less.	5.1.2
Space heating equipment other than boilers.	5.1.4
Cooling towers with a circulation rate less than 10,000 gal/min.	5.3
Containers used to store clean produced water	5.7.1
Brazing, soldering, or welding equipment.	5.10.1
Fugitive emissions sources associated with exempt equipment.	5.10.3
Equipment used to compress natural gas.	5.10.2
Containers used to store unheated organic material with an initial boiling point ≥ 302 F.	5.7.5
Containers used to store petroleum distillates used as motor fuel with specific gravity ≥ 0.8251 .	5.7.7
Containers used to store refined lubricating oils.	5.7.8
Equipment used to apply architectural coatings.	5.9.1
Equipment used exclusively for the transfer of refined lubricating oil.	5.8.2
Unheated, non-conveyorized degreasers < 10 ft ² open area; using solvents with initial boiling point ≥ 248 F; and < 25 gal/yr evaporative losses.	5.9.2
Non-structural repairs & maintenance to permitted equipment.	4.2.6
Emissions less than 2 lb/day from units not included above.	4.2.1

Attachment C
EPA Comments and Responses

EPA COMMENTS / DISTRICT RESPONSE

The EPA's comment regarding the proposed Title V Operating Permit for PG & E (District facility C-904) is encapsulated below followed by the District's response. A copy of the EPA's 9/19/97 letter is available at the District.

1. **EPA COMMENT**

...EPA requests that the District provide us with your analysis of whether a cumulative emissions increase exceeded the Prevention of Significant Deterioration (PSD) significance thresholds... We recommend that the District address PSD applicability, even for sources that are not subject, in Title V permit reviews.

DISTRICT RESPONSE

PG & E has stated that cumulative emissions increases have not exceeded the PSD significance thresholds during the period between 1982 and 1989.

In general, the District does not have the authority to issue permits under the Federal Prevention of Significant Deterioration (PSD) program. Hence, we will not address PSD applicability in Title V Operating Permits unless the facility has previously received a PSD permit, in which case we will simply incorporate the conditions from the old PSD permit into the Title V Operating Permit.

2. **EPA COMMENT**

....We request that the District provide us with data on the accuracy of the portable analyzers.... we request that the District confirm how often it intends to require source testing.

DISTRICT RESPONSE

For the permit units which are required to use a portable analyzer (permit units C-904-6-2 through C-904-9-2), the analyzers are being used to assure compliance with sections 5.1.1 and 5.4.2 of District Rule 4701. Since the PG & E facility is located "west of Interstate Highway 5" per the definition in section 3.22 of District Rule 4701, these monitoring requirements are not Federally Enforceable. Compliance with the Federally Enforceable District NSR Rule is assured by source testing every 8,760 hours of operation, as stipulated in condition 6 of the requirements for these permit units. Hence, conformance with EPA's Relative Accuracy guidelines is not necessary for these analyzers. However, to assure that the analyzers operate with as high a level of accuracy as possible, condition 19 has been added to the requirements for these permit units to specify that a two-point

calibration with certified calibration gasses will be performed prior to each use of the analyzer.

For these units, condition 6 stipulates that source testing to demonstrate compliance with NO_x and CO emission limits must be done every 8,760 hours of engine operation. It may take an engine only one year to operate 8,760 hours or it may take an engine longer than one year to operate for this length of time. The source testing requirement is not specified in calendar time, but rather in equipment operation time.

Attachment D
Facility Comments and Responses

FACILITY COMMENTS / DISTRICT RESPONSE

The PG&E facility's comments regarding the proposed Title V Operating Permit for PG & E (District facility C-904) is encapsulated below followed by the District's response. A copy of the facility's September 15, 1997 commenting letter is available at the District.

1. **FACILITY COMMENT**

....remove requirements associated with SIP-approved administrative rule, including District Rules 2010, 2031, 2040....we request these rules not be included in the Title V Permit....

DISTRICT RESPONSE

District Rules 2010, 2031 and 2040 are rules applicable to any air pollution source in the San Joaquin Valley, and as such, the District has chosen to include these requirements as part of the facility-wide conditions in all Title V Operating Permits. The operator of this facility would be obligated to comply with these requirements, regardless of whether such requirements appeared in the Title V Operating Permit. District Rule 2520 and 40 CFR 70 require Title V Operating Permits to assure compliance with all applicable requirements. District Rules 2010, 2031 and 2040 are all Federally Enforceable applicable requirements. Hence, the conditions will remain in the Permit.

2. **FACILITY COMMENT**

....request to include the phrase "or subsequent or approved alternative method" after source sampling method number citations throughout the Title V Operating Permit....

DISTRICT RESPONSE

Current District and Federal regulations specify particular methods which must be followed for source and fuel testing purposes. If such regulations are amended to allow other testing methods, then the Title V Operating Permit language can be revised at the next 5-year permit renewal.

3. **FACILITY COMMENT**

....remove condition 33 of the facility-wide requirements, referring to District Rule 8060....

DISTRICT RESPONSE

District Rule 8060 is a generally applicable requirement which applies to any road in the San Joaquin Valley which is constructed after 10/10/93. If PG&E constructs such a road in the future, the rule would apply.

4. FACILITY COMMENT

....request for permit shield from Kings County Rule 405.3 and 419; and for District Rule 4102 in the facility-wide conditions....

DISTRICT RESPONSE

Kings County Rule 405.3 has been replaced by SIP-approved District Rule 4601 (architectural coatings) and therefore, no shield is necessary from Kings County Rule 405.3. EPA has never recognized Kings County Rule 419 or District Rule 4102 (nuisance) as Federally Enforceable, and therefore no shield is necessary from these rules.

5. FACILITY COMMENT

Change language on engine permits from “permittee shall record engine fuel usage, engine operating hours....” to “permittee shall record total engine fuel usage, individual engine operating hours....” and change rule attribution for this condition to “District-only”....

DISTRICT RESPONSE

Language changes have been made to all engine permit unit requirements as requested. These changes only clarify an existing permit condition, and are not considered a modification under the District NSR Rule. The requirement to record fuel usage and operating hours does not assure compliance with any Federally Enforceable requirement and therefore, the request to change the rule attribution for this condition is accepted. The condition is now attributed to District Rule 4102 on all engine permit unit requirements.

6. FACILITY COMMENT

....include permit shield from District Rules 4201 and 4801; and Kings County Rules 404 and 407....

DISTRICT RESPONSE

Section IX of the Engineering Evaluation demonstrated compliance with these rules for all engine units at the facility. Compliance is assured by conditions 3, 5, 6 and 7 of the requirements for permit units C-904-2-1 through C-904-5-1 and C-904-10-1 through C-904-18-1; conditions 14, 16, 17 and 18 of the requirements for permit units C-904-6-2 through C-904-9-2; and conditions 2, 4, 5 and 6 of the requirements for permit unit C-904-20-1. Therefore, the permit shield is granted as requested in condition 8 of the requirements for permit units C-904-2-1 through C-904-5-1 and C-904-10-1 through C-904-18-1; condition 20 of the requirements for permit units C-904-6-2 through C-904-9-2; and condition 7 of the requirements for permit unit C-904-20-1.

7. FACILITY COMMENT

....change rule attribution to "District-only" for source testing protocol conditions (conditions 4 and 5 of the requirements for permit units C-904-6-2 through C-904-9-2: submission of source test plan and submission of test results within 60 days of testing)....testing only required for District-only requirements....

DISTRICT RESPONSE

These conditions assure compliance with District Rule 1081, which is a Federally Enforceable requirement. Because these conditions assure compliance with District Rule 1081, they must be listed on the Title V Permit as "Federally Enforceable through the Title V Permit".

8. FACILITY COMMENT

....change rule attribution to "District-only" for Daily Emission Limit (DEL) conditions (condition 8 of the requirements for permit units C-904-6-2 through C-904-9-2)....these conditions are not associated with NSR offsets or BACT....

DISTRICT RESPONSE

The District NSR Rule requires that the District place DELs on the permit of any emission unit which underwent New Source Review, regardless of whether that New Source Review resulted in the requirement for offsets or Best Available Control Technology (BACT). Since condition 8 of the requirements for permit units C-904-6-2 through C-904-9-2 was included as required by the District NSR Rule, the condition must be considered Federally Enforceable and attributable to the District NSR Rule on the Title V Permit.

9. FACILITY COMMENT

....change rule attribution on conditions 9 through 13 of the requirements for permit units C-904-6-2 through C-904-9-2 from "District Rule 2520, 9.4.2" to "District Rule 4701"....

DISTRICT RESPONSE

The District agrees that conditions 9 through 13 of the requirements for permit units C-904-6-2 through C-904-9-2 assure compliance with sections 5.1.1 and 5.4.2 of District Rule 4701 and do not assure compliance with the DELs set pursuant to the District NSR Rule. Compliance with the DELs is assured by the periodic source testing required in condition 6 of the requirements for these permit units. Since the PG&E facility is defined in section 3.22 of District Rule 4701 as "west of Interstate Highway 5", the rule will never be Federally Enforceable for this facility. Therefore, the rule attribution for these conditions has been changed to "District Rule 4701" and the conditions have not been listed as Federally Enforceable on the permit unit requirements.

10. FACILITY COMMENT

....include permit shield from District Rule 4625 for oil/water separator....

DISTRICT RESPONSE

Compliance with District Rule 4625 is assured by conditions 3,4 and 5 of the requirements for permit unit C-904-19-1. Therefore, the shield is granted in condition 7 of the requirements for permit unit C-904-19-1.

11. FACILITY COMMENT

....remove condition 5 of the requirements for permit unit C-904-22-1 (2,000 gallon tank)....

DISTRICT RESPONSE

Condition 5 assured compliance with District Rule 4621, which prohibits the unloading of gasoline from a delivery vessel unless valid decals are displayed on the cargo tank. This requirement applies to the owner of the stationary source receiving the shipment of gasoline. Therefore, the condition shall remain part of the requirements for permit unit C-904-22-1.

12. FACILITY COMMENT

...in condition 7 of the requirements for permit unit C-904-22-1, change testing requirement from “every year” to “every 5 years”....

DISTRICT RESPONSE

The condition has been changed, pursuant to the 5 year testing requirement in District Rule 4622.

13. FACILITY COMMENT

...change leak testing frequency in condition 12 of the requirements for permit unit C-904-22-1 from “every year” to “every 5 years”....

DISTRICT RESPONSE

Section 5.6 of District Rule 4622 specifies that leak testing shall be performed using EPA Method 21, but does not provide a testing frequency. District Rule 2520, 9.4.2 authorizes the District to require monitoring, recordkeeping or reporting sufficient to assure compliance with an applicable requirement, if sufficient monitoring is not already associated with a given emission limit or standard. The District has determined that yearly leak testing is appropriate to assure compliance with section 5.6 of District Rule 4622.

14. FACILITY COMMENT

....include permit shield for District Rules 4621, 4622 and 4623; and Kings County Rules 412.1, 412.2 and 412.3 for permit unit C-904-22-1....

DISTRICT RESPONSE

Compliance with District Rules 4621, 4622 and 4623 is assured by conditions 2 through 12, 14 and 15 of the requirements for this permit unit. Therefore, a shield is granted in condition 17 of the requirements for permit unit C-904-22-1. No permit shield is necessary from old Kings County Rules 412.1, 412.2 and 412.3 because these rules have been replaced by new SIP-approved rules.

15. FACILITY COMMENT

....change rule attribution to "District-only" for recordkeeping requirements on unconfined abrasive blasting (permit unit C-904-24-1)....

DISTRICT RESPONSE

Condition 7 of the requirements for permit unit C-904-24-1 does not assure compliance with any District-only or Federally Enforceable requirement. Therefore, the rule attribution was changed to "District Rule 4102" and was not listed as Federally Enforceable on the permit requirements for this unit.

16. FACILITY COMMENT

....various comments on permit conditions for permit units C-904-25-1 and C-904-26-1....

DISTRICT RESPONSE

In the Title V Permit application for this facility, the applicant requested the use of I.C. Engine template SJV-IC-1-0 for these two permit units. When such a template is utilized, the conditions from that template are used verbatim for that unit's permit conditions. Therefore, no changes were made to conditions 1 through 11 of the requirements for permit units C-904-25-1 and C-904-26-1.